

REMARKS

In the Listing of Claims, Applicants have amended claims 1, 4 – 6, 8 – 10, 14, 15, 18 – 23, 27, 30 – 35 and 39 – 44; canceled claims 3, 7, 17 and 29; and added dependent claims 45 and 46. Amendments have been made to improve clarity and to correct minor typographical errors.

Claims 1-44 were pending in the Application prior to the outstanding Office Action. In the Office Action, claims 1-44 were rejected under 35 U.S.C. §103(a).

I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

The Examiner rejected claims 1-44 under 35 U.S.C. §103(a) as being unpatentable over the following references:

- (1) Semi E37-0298, High-Speed SECS Message Services (HSMS) Generic Services (“E37-0298”); and
- (2) Semi E30-0299, Generic Model for Communications and Control of Semi Equipment (GEM) (“E30-0299”).

E37-0298 describes a communication interface suitable for the exchange of messages between two computers in a semiconductor factory utilizing the TCP/IP protocol. Each computer, or entity, can be a host or a piece of equipment. [see p. 3]. *E37-0298* describes a mechanism to encapsulate point to point communication between two such entities over TCP/IP. This encapsulation is accomplished utilizing an HSMS Message Header and a defined format of fields within the HSMS Message header [see pp. 10-14]. *E37-098* does not specify what kind of information is actually exchanged between the two entities, only the mechanism to convey that information utilizing TCP/IP. Furthermore, *E37-098* does not disclose or suggest any communication transfer involving more than two entities. In particular, *E37-098* does not disclose or suggest a client system making requests of a server which then communicates with a tool. *E37-098* is directed at the exchange of messages between a host and a tool.

E30-0299 describes the exchange of messages between a host and a piece of equipment. *E30-0299* describes what messages should be used, in what situations,

and what the resulting activity should be. *E30-0299* does not define the behavior of the host computer and the scenarios under which the host initiates communication with a piece of equipment [see p. 3]. *E30-0299* does not disclose or suggest any communication between a client system and the host. In particular, *E30-0299* does not disclose or suggest a client system making requests of the host, and does not disclose the host generating replies to the client system. For example, Section 3.3 cited by the Examiner states that it addresses the “equipment’s responsibility to act upon messages that it receives.” [see p. 12] Additionally, Section 4 cited by the Examiner states that it applies to “operations performed by semiconductor manufacturing equipment.” [see p. 17] Thus, *E30-0299* is only concerned with the exchange of messages between a host and a piece of equipment.

A. Independent Claims 1, 15 and 27 Patently Distinguish over *E37-0298* in view of *E30-0299*

Claims 1, 15 and 27 each recite “receiving a first request from a client system via a network” and “sending a first message to a tool.” The first request and the first message are different entities serving different purposes. The apparatus that receives the first request and sends the first message acts as an intermediary between a client system and a tool. See for example Figure 1 illustrating client systems 112, 113, 114 and 115, server 110 and tools 111 and the specification at p. 8 line 13 through p. 10 line 5. A user at the client system can request an action of a tool, utilizing for example a Web browser. The intermediate apparatus, for example a server, will process the request from the client system, determine what message to send to which tool, and send a message to a tool to perform the requested action. The user may also interact with the server to query and modify tool configuration.

In contrast, *E37-0298* and *E30-0299* only contemplate the communication between a host and a tool. These standards relate to the messaging protocol to exchange messages between hosts and equipment. Thus, they only relate to the second half of independent claims 1, 15 and 27. There is no “receiving a first request from a client system via a network” in *E37-0298* and *E30-0299*. These references only

disclose sending messages to tools to perform actions. Thus, there is no teaching or suggestion in E37-0298 or E30-0299, either singly or in combination, to have two separate communication channels, one between the client system and the server, and a second one between the server and the tool. Note also that the specification of the present invention describes the communication between the server and the tool with respect to E37-0299 [see p. 29 line 17 through p. 30, line 7]. The specification of the present invention also describes the control and monitoring methods of E30-0299 as applicable to the communication with the tool [see p.30, lines 19-21]. Neither of these standards relates to the communication between the client system and the server.

Therefore, claims 1, 15 and 27 are not obvious over E37-0298 in view of E30-0299. Applicants respectfully request the Examiner to allow claims 1, 15 and 27.

B. Dependent Claims 2, 4 – 6, 8 – 14, 16, 18 – 26, 28 and 30 – 46 Patently Distinguish over *E37-0298* in view of *E30-0299*

Dependent claims 2, 4 – 6, 8 – 14, 16, 18 – 26, 28 and 30 – 46 depend directly or indirectly from independent claims 1, 15 and 27 and incorporate all of the limitations of the independent claims upon which they depend. Applicants respectfully assert that dependent claims 2, 4 – 6, 8 – 14, 16, 18 – 26, 28 and 30 – 46 are therefore patently distinguishable over E37-0298 in view of E30-0299 for at least the reasons stated above.

Additional Remarks

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. §1.136 for extending the time to respond up to and including today, August 12, 2004.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-0639 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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By: _____



Stephen W. Melvin
Reg. No. 50,467

Stephen W. Melvin, Ph.D.
O'MELVENY & MYERS LLP
Embarcadero Center West
275 Battery Street, 26th Floor
San Francisco, California 94111-3344
Telephone: (415) 984-8700
Facsimile: (415) 984-8701
Email: smelvin@omm.com

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